IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JUAN PABLO GARIBAY, on behalf of)
himself, and all other similarly situated) No. 15 cv 8162
plaintiffs known and unknown,)
Plaintiff) Honorable Judge Manish S. Shah
v.)
) JURY DEMAND
G.T. LANDSCAPING LLC., AND GILBERTO)
TOLEDO, INDIVIDUALLY)
Defendants)
)
)
)
)
	J

STIPULATION OF DISMISSAL

Plaintiffs Juan Pablo Garibay and Hector Gutierrez and Defendants G.T. Landscaping LLC and Gilberto Toledo, individually, through their attorneys and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, having resolved all outstanding issues in this litigation between them, hereby stipulate and agree that effective with filing of this Stipulation of Dismissal, all of Plaintiffs' claims may be dismissed as to Defendants, without prejudice, each party to bear its own costs and fees. Plaintiffs are given leave to move to reinstate on or before March 31, 2017, in the event Defendants have not materially complied with the payment terms of the Settlement Agreement in this matter. The Parties agree that reinstatement, if any, shall be for the sole purpose of collecting settlement payment(s). If Plaintiffs have not moved to reinstate before March 31, 2017, dismissal of all their claims shall automatically convert to be with prejudice.

Dated: September 12, 2016	Respectfully submitted,
s/ Pedro Cervantes	s/ Meghan A. VanLeuwer

Pedro Cervantes

Tristan & Cervantes 30 W. Monroe Street, Suite 630 Chicago, IL, 60603 (312) 345-9200 Meghan A. VanLeuwen

Farmworker & Landscaper Advocacy Project 33 N. LaSalle Street, Suite 900 Chicago, IL, 60602 (312) 784-3541